

## **EXHIBIT G**

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November 24, 2015

Lindsay M. Weber  
Quinn Emanuel Urquhart & Sullivan, LLP  
51 Madison Avenue, 22nd Fl.,  
New York, NY 10010

Re: *Picard v. Ceretti et al.*  
Adv. No. 09-01161 (SMB)

Dear Lindsay:

We write in response to your letter of November 23, 2015. Following the meet and confer sessions with you that commenced on October 1, the Trustee made his initial production of documents to the Kingate Funds and will timely respond to the Funds' document requests served November 6. We appreciate the Kingate Funds' wish, as stated in your letter, and other efforts to proceed with discovery and minimize further delay in producing documents responsive to the Trustee's document requests served on October 7. The Trustee cannot make the specific concessions you requested for "enhanced confidentiality" in your November 23 letter, however. As pointed out in my November 12, 2015 letter, the June 6, 2011 Litigation Protective Order governs document productions in this case, and Paragraph 4(e), in particular, governs the issue of whether the identities of initial or subsequent transferees from BLMIS, and the amount, receipt, and date of each transfer is discoverable. That order further expressly provides such information is not confidential. My November 12 letter also set forth a number of other reasons why shareholder information is relevant and discoverable in the Trustee's action against the Kingate Funds. In addition, the Third-Party Data Room Orders govern what documents may be excluded from the Data Rooms. Our offer on October 1 was to work with the Funds to protect sensitive information, but we cannot withhold documents from the Data Rooms entirely.

At this point, we believe that achieving our mutual desire to avoid further delay in the Trustee obtaining the documents voluntarily produced to the Kingate Funds by third parties, and currently in the Funds' possession, requires that we request an informal conference with Judge Bernstein under Local Rule 7007-1(b) and applicable chambers rules. Typically, the Court proposes dates for a 10 a.m. hearing once the request for the conference is made. We intend

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to submit that letter request to the Court, and anticipate we will be contacted by the court regarding a date to be heard.

Sincerely,



Karin Scholz Jenson



cc: Robert S. Loigman  
Rex Lee  
David J. Sheehan  
Geraldine E. Ponto  
John Burke  
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